<u>REMARKS/ARGUMENTS</u>

Favorable reconsideration of this application, in light of the present amendments and following discussion, is respectfully requested.

Claims 1-15 are pending in the present application, Claims 1 and 15 having been amended. Support for the amendment to Claims 1 and 15 is found in the specification, for example, at page 6, lines 4-6. Thus, no new matter is added.

In the outstanding Office Action, Claim 1 was objected to; Claims 1-7 and 15 were rejected under 35 U.S.C. §102(b)[1] and (e) as anticipated by <u>Kanekar et al.</u> (U.S. Patent No. 6,751,191, hereinafter <u>Kanekar</u>); Claims 8-10 were rejected under 35 U.S.C. §103(a) as unpatentable over <u>Kanekar</u> in view of <u>Chao et al.</u> (U.S. Patent No. 6,081,507, hereinafter <u>Chao</u>); and Claims 11-14 were rejected under 35 U.S.C. §103(a) as unpatentable over <u>Kanekar</u> in view of <u>Simon et al.</u> (U.S. Patent No. 6,380,869, hereinafter <u>Simon</u>).

With respect to the objection of Claim 1, Claim 1 is amended to over come the objection.

Turning now to the rejection of Claim 1 as anticipated by <u>Kanekar</u>, Applicants respectfully traverse the rejection. Claim 1 recites, *inter alia*,

> a memory unit configured to store a configuration file including a given set of routings between said input devices and output devices; and

> said memory unit further configured to store a routing table, wherein the generic router is further configured to load a subset of the given set of routings from said configuration file into said routing table, and to execute routings between said input devices and output devices according to the routings loaded into said routing table.

<u>Kanekar</u> does not describe or suggest these elements of Claim 1.

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[1] <u>Kanekar</u> is not prior art under 35 U.S.C. §102(b).

As stated in the specification, "a routing defines a data path between an input and an output."[2] MPEP §2106 states "where an explicit definition is provided by the applicant for a claim term, that definition will control interpretation of the term as it is used in the claim." Thus, the claim term "routings" must be interpreted as defined in the specification.

Kanekar describes a system where a master router and a slave router are housed in a common chassis. The master and slave router share a set of interfaces. A configuration file is created to provide configuration information to the master and slave routers to facilitate switching from the master to the slave.[3] Fig. 4 depicts the configuration file of Kanekar. Fig. 4 does not show that the configuration file includes "a given set of *routings* between said input devices and output devices." Furthermore, Fig. 4 does not show that a router can load a subset of the given set of routings from the configuration file into the routing table. The configuration file described in Kanekar only includes parameters for the master and slave routers, such as their IP addresses, and associated masks.[4]

The master and slave routers each have their own routing table, and the routers dynamically exchange routing updates.[5] However, the routing updates are not described as being part of the configuration file. As can be seen from Fig. 3 of Kanekar, routing updates are exchanged on path 214, which is separate from configuration information 208.

The outstanding Office Action relies heavily on the statement that when the master router fails, redundancy allows the system to operate seamlessly.[6] However, this result and/or purpose of Kanekar does not describe or suggest the claimed "a memory unit configured to store a configuration file including a given set of routings between said input devices and output devices; and said memory unit further configured to store a routing table,

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[2] Specification, page 6, lines 6-7.
[3] Kanekar, col. 6, lines 62-65.
[4] Kanekar, col. 7, lines 4-16, and Fig. 4.
[5] Kanekar, col. 10, lines 50-53, and 66-67.
[6] Office Action, pages 3, 4, and 11.

wherein the generic router is further configured to load a subset of the given set of routings

from said configuration file into said routing table."

In view of the above-noted distinctions, Applicants respectfully submit that Claim 1

(and dependent Claims 2-14) patentably distinguish over Kanekar. Claim 15 recites elements

similar to the elements recited in Claim 1. Thus, Applicants respectfully submit that Claim

15 patentably distinguishes over Kanekar.

In addition, Claim 3 recites, *inter alia*, "wherein said generic router is configured to

activate said input devices and output devices dedicated to an application at start-up and to

load said routing table at start-up." Kanekar does not describe this element of Claim 3.

The outstanding Office Action states that when the master router fails, the slave router

"starts up" by taking over the layer 2 table for layer 2 packets.[7] However, Claim 3 requires

that the generic router activate the input and output devices. Kanekar does not describe or

suggest that the generic router activate input and output devices. On the contrary, since the

slave router takes over for the master router, and the master router was routing packets

between the input device and the output device, the input and output devices were already

activated. Thus, Claim 3 further patentably distinguishes over Kanekar.

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[7] Office Action, page 4.

Consequently, in view of the above amendments and comments, it is respectfully

submitted that the outstanding rejection is traversed and that the pending claims are in

condition for allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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